

Green & Willstatter
ATTORNEYS AT LAW
200 MAMARONECK AVENUE
SUITE 605
WHITE PLAINS, NEW YORK 10601

THEODORE S. GREEN
RICHARD D. WILLSTATTER

(914) 948-5656
FAX (914) 948-8730

E-MAIL: THEOSGREEN@MSN.COM

June 7, 2011

HON. COLLEEN McMAHON
United States District Court
500 Pearl Street
New York, New York 10007

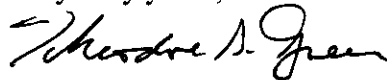
re: *United States v. Cromitie, et al. (David Williams)*
09 Cr 558 (CM)

Dear Judge McMahon:

This letter is submitted as a supplemental presentence memorandum on behalf of defendant David Williams.

David Williams joins in the arguments set forth in the presentencing memorandum of co-defendant Onta Williams with respect to the issues of sentencing entrapment and sentencing manipulation, as a basis both for a downward departure from the guidelines and, in the case of sentencing manipulation, a sentence significantly below the 25-year mandatory minimum. The Court should find sentencing manipulation based on the government's introduction of a guided missile system into the case (as well as the IED's), that this resulted in an improper enlargement of the scope and/or scale of the crime, and that the manipulation is sufficiently extreme and unusual, *see United States v. Fontes*, 415 F.3d 174(1st Cir. 2005), such that the Court is empowered to, and should, impose a sentence below the statutory minimum.

Very truly yours,



THEODORE S. GREEN

To: All counsel (by e-mail)